

## EXHIBIT B

**Plaintiff's Proposed Jurisdictional Discovery**

*An Phan and Taylor Bartlett v. Grand Bahama Cruise Line, et al.*  
(Case No. 15-cv-05019)

1. Proposed PMK Deposition Topics for Bahamas Paradise Defendants
  - a. Any relationship or dealings between GBCL and the Bahamas Paradise Defendants (or any of their agents or co-venturers, including but not limited to tour operators) relating to the Grand Celebration.
  - b. Any benefit, direct or indirect, received by the Bahamas Paradise Defendants as a result of GBCL's telemarketing activities for the booking of cruises on the Grand Celebration.
  - c. Any knowledge the Bahamas Paradise Defendants have of GBCL's telemarketing activities for the booking of cruises on the Grand Celebration.
2. Proposed Document Requests
  - a. All documents that discuss or evidence the matters set forth in any of Plaintiffs' three PMK deposition topics.